

CONSUMER ACTION NETWORK

Of, By and For Deaf and Hard of Hearing Americans

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March 17, 1997

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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Dear Mr. Caton:

The Consumer Action Network (CAN) submits these comments to the Federal Communications Commission on its Notice of Inquiry (NOI) on Telecommunications Relay Services, the Americans with Disabilities Act of 1990, and the Telecommunications Act of 1996 (released January 14, 1997). CAN, a coalition of 19 national organizations of, by, and for deaf and hard of hearing people, addresses advocacy and legislative issues important to our constituency. Such issues include protecting the rights of deaf and hard of hearing persons, improving quality of life, empowering consumer leadership and self-representation, and ensuring equal access to education, employment, communication, technology, and community life.

CAN thanks the Federal Communications Commission for its commitment to access for all Americans.

Respectfully submitted,



Barbara Raimondo, J.D.
Legislative Consultant

Enclosures

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

MAR 1 1997

In the Matter of)	
)	
Telecommunications Relay Services,)	MM Docket No. 95-176
the Americans with Disabilities Act of 1990,)	
and the Telecommunications Act of 1996)	

**Comments of
the Consumer Action Network**

I. Introduction

The Consumer Action Network (CAN) submits these comments to the Federal Communications Commission on its Notice of Inquiry (NOI) on Telecommunications Relay Services, the Americans with Disabilities Act of 1990, and the Telecommunications Act of 1996 (released January 14, 1997).

CAN, a coalition of national organizations¹ of, by, and for deaf and hard of hearing people, addresses advocacy and legislative issues important to our constituency. Such issues include protecting the rights of deaf and hard of hearing persons, improving quality of life, empowering consumer leadership and self-representation, and ensuring equal access to education, employment, communication, technology, and community life.

Nationwide availability of telecommunications relay services (TRS) has provided deaf and hard of hearing people with greatly increased access to communication, therefore greatly increased access to work, family, and the essentials and conveniences of everyday life. We anticipate that this NOI will provide the Commission with substantial valuable information. We

¹Please see signature page for a list of CAN members.

encourage the Commission to use this information to promulgate rules that will improve TRS.

This proceeding focuses on many important TRS issues, and commenters are sure to raise many others. In promulgating rules for TRS, there are several principles that the Commission should follow.

- Deaf and hard of hearing callers require access to the telephone that is the functional equivalent of the access afforded to hearing callers. The deaf and hard of hearing community is made up of a variety of individuals, including people who were born deaf, those who became deaf in childhood, late-deafened adults, and individuals who are deaf-blind. Different individuals have different needs and expectations regarding telephone access.

- Taking steps to shorten TRS calls while maintaining the integrity of the calls will save time and money for the callers and preserve TRS resources.

- Improving TRS for hearing callers will result in benefits for deaf and hard of hearing callers. If hearing callers are more familiar and more comfortable with TRS they will be more likely to use it. If more hearing callers use it, communication access for deaf and hard of hearing consumers will be greater.

- The Commission's rules on TRS should provide for seamless communication between callers to the extent possible.

- The Commission's rules should encourage TRS to be compatible with new technology used by the public at large and by TTY users in their communications with TRS.

II. Improved TRS - Coverage Under Title IV of the ADA

As a preliminary matter, the Commission seeks comment on whether the requirements of Title IV of the ADA also apply to any improved TRS

service, such as Video Relay Interpreting (VRI) or speech to speech relay. CAN believes that they do. Title IV defines "telecommunications relay services" as

"telephone transmission services that provide the ability for an individual who has a hearing impairment or speech impairment to engage in communication by wire or radio in a manner that is functionally equivalent to the ability of an individual who does not have a[n] . . . impairment to communicate using voice communication services by wire or radio. Such term also includes services that enable two-way communication between an individual who uses a TDD or other nonvoice terminal device and an individual who does not use such a device." 47 U.S.C. § 225 (a)(3).

This provision is quite broad. It does not specify or limit the manner in which an individual with a hearing or speech "impairment" must communicate using TRS. It allows for communication devices other than TDDs to be used. VRI and speech-to-speech relay services clearly fall within this definition. They perform the function described in the definition of TRS.

In a time of rapidly advancing technology, it would be short sighted to define TRS services as exclusive of anything but the traditional TTY-to-speech and speech-to-TTY paradigm. Commission rules should apply to these improved TRS services.

A. Video Relay Interpreting (VRI)

CAN supports the expansion of video relay interpreting for several important reasons. Often VRI can allow a higher level of comfort than is afforded by a TTY. VRI can increase speed and fluidity of conversations because signing is much faster than typing and is not limited by the typing speeds that Communications Assistants (CAs) type or that TTYs can display. Faster calls result in lower costs and time savings. VRI allows deaf callers to use the telephone in their native language, just as hearing people use the telephone in their native language. VRI allows deaf people who cannot read

or write to use the telephone, just as hearing people who cannot read and write can use the telephone. Similarly young deaf children who cannot type are able to use VRI, just as young hearing children are able to use the telephone.

For these reasons we believe the Commission should encourage broader use of VRI. We believe the Commission should encourage TRS providers to use VRI technology that offers the opportunity of users to use signed English or other visual forms of communication. We recommend that the Commission promote its use beyond telephone calls to interpreting in other situations.

We also believe that the development of VRI technology will ultimately result in greater direct telecommunications access in non-TRS situations. Improved VRI technology can result in telecommunications technology available for home use which will allow a caller with a video camera, a computer, and the appropriate connection to communicate with another caller with a similar set-up. Deaf and hard of hearing individuals generally prefer this type of "face to face" communication over TTY-to-TTY communication. Similarly, wider availability of this technology would benefit hearing people, who would be able to communicate face to face. This could be useful unlimited types of situations ranging from business meetings to personal calls.

B. Speech-to-Speech Relay Services

Speech-to-speech relay service can be important for deaf and hard of hearing callers. Many prefer to use their voice on the telephone, and many do not like to type or do not type well. Further, this is another service that can increase the speed of a TRS call. The Commission should encourage more research and greater use of this service.

C. Other Ways to Improve TRS

1. Call Interruptions or Suspensions

A. Caller Initiated Interruptions

TRS should offer callers the capability to interrupt. It is natural in conversation to occasionally interrupt the other party to clarify a point, to add an important piece of information, or for other reasons. Without the opportunity to interrupt, TRS users lose time waiting for the other party to finish what they are saying or typing, when perhaps that person is on the wrong track. Callers should be able to interrupt as they deem appropriate. This is an option that can help shorten the length of TRS calls, thus benefiting the consumers through less time spent on the phone, and saving money.

B. Communication Assistant (CA) Replacement Interruptions

Consumers find that often the TRS CA interrupts a call to let the callers know the CA is going off shift and will be replaced. It is distracting to get this message in the middle of a call. It is puzzling to get it when one is only a few minutes into the call. For some, this interruption can cause tangible detriment, for example in the case of someone who depends on the phone for their livelihood. Let's take the case of the deaf employee selling print advertising over the phone to hearing potential customers. While both hearing and deaf sales people face difficulties in selling over the phone - many consumers do not care for phone solicitation, to say the least - this deaf individual faces an additional obstacles in closing sales. He is using a relay service, which most hearing people are not familiar with. During this call, if the CA interrupts to say he or she is going off shift, this interruption can interfere with the salesperson's ability to make a sale. This kind of interruption can have a negative impact on other types of calls as well, from

deaf professional to hearing colleague, from hearing doctor to hard of hearing patient, from deaf customer to hearing telephone order clerk, and in many other instances.

Besides the act of simple interruption, there are substantive reasons why such interruptions should be minimized. During the course of the relay call the CA becomes familiar with terms that are unique to a particular conversation or type of conversation. The CA may learn the meanings of acronyms, the names of parties and locations that are being discussed, or specialized industry terms. The replacement CA may not be familiar with these and may require some time to be able to follow the content of the conversation and therefore relay it accurately.

Other service industries do not permit this type of interruption. For example, if a traveler calls an airline to make a reservation, the reservationist will continue to serve that caller for as long as it takes to complete the reservation process.

The average relay call lasts less than 10 minutes. Requiring the CA to stay on a call for a minimum of 15 minutes will help resolve this problem in many instances. We are aware that CAs need periodic breaks to be able to be at their best and to prevent work-related injuries, such as carpal tunnel syndrome. We believe guidelines can be written that will allow CAs the appropriate number and length of breaks while at the same time guarding the integrity of calls.

2. CA Training and Quality Standards

CAN would like to recognize the sense of professionalism that CAs bring to their job. They perform an essential service. However, there are training and quality standards that need to be addressed.

A. Typing Speed

Deaf, hard of hearing, and hearing callers believe this is an area where improvement is needed. One of the biggest barriers that prevents hearing callers from accepting TRS calls is the length of time it takes to complete a TRS call. Hearing callers are used to speaking at normal conversational speed. With a TRS call, hearing callers find that they must slow down significantly before the CA can follow what they are saying. Often they must speak at a speed that is uncomfortably slow. Because of this, many hearing callers often leave out much of what they want to say, knowing that if they included everything, their call might well last for hours. Other hearing people avoid TRS entirely.

Similarly, often TTY users can read at speeds much higher than the speed at which messages are typed by the CA. More and more TTY users have TTYs equipped with enhanced code technology (such as Turbo Code) which allows for the display of typing speeds up to 120 words per minute. Some deaf and hard of hearing callers prefer to use their computer and ASCII, which allows typing speeds of up to 100 to 150 words per minute. In other situations, deaf and hard of hearing persons experience real time captioning, which displays up to 250-300 words per minute, the speed of flowing conversation. If relay centers used this speed, deaf and hard of hearing callers could read it on a computer screen. In short, technology allows for much faster communication that is currently experienced through TRS, yet the typing speed required by CAs does not reflect this. For now, we propose that the Commission require a typing speed for CAs that is closer to the speed of real time transmission. This speed should be calculated using an auditory typing test, not a written one, since the CA will transcribing words from what she or he hears, not what is written. During a call, the caller should be able to

request that the transmission be slowed down, if necessary for the caller's comfort. Requiring a faster minimum typing speed will constitute a major step in shortening TRS calls, while maintaining the integrity of these calls.

Further, we propose that within two years the Commission require that real time TRS calls be available to callers with the appropriate equipment (such as a computer and the proper speed modem). The Commission should ensure that there is a coordination of equipment, software, and CA standards to make real time TRS calls a reality within this time frame.

B. Accuracy and Grammar

Accuracy and grammar are very important in a TRS call. If typing is inaccurate or grammatically incorrect the message can be lost or confusing. TRS users have concerns about the accuracy of CAs' typing and use of grammar. They have had CAs' mistakes brought to their attention after the call was complete. Proper names and acronyms are often incorrect. Mistakes that the CA types can make the message to the TTY user difficult to understand. TTY users are frustrated by these errors.

For these reasons, the Commission should set minimum standards for accuracy. These standards can be met through the use of software that automatically corrects spelling and grammar mistakes, which some TRS have used successfully. This software also helps shorten TRS calls by allowing errors to be corrected without requiring the CA to retype the words.

C. Training in Use of Equipment

Sometimes CAs are unable to use some of the services that are advertised and promoted by the TRS. This happens quite often in the area of two line voice carry over-to-voice carry over (VCO-to-VCO) services. Recently a Virginia organization that advocates for deaf and hard of hearing people set up demonstrations of two line VCO-to-VCO. Experienced users of

this technology were anxious to demonstrate its benefits to other potential users. To their chagrin, when the facilitator tried to demonstrate it, he was successful in only one out of five attempts. Many CAs tried to complete the call but simply did not know how to use the technology.

In addition, CAs often have difficulty handling conference calls. They are not familiar with conference call procedures and often are unable to control the flow of the conversation in order to give the TTY user an opportunity to contribute.

Currently there is no standard training for all CAs for these services. Commission rules should require that CAs have appropriate training to ensure their expertise in using the services the TRS purports to provide.

D. Confidentiality

Numerous personal and business transactions are conducted over the phone using TRS. Private information including credit card numbers, identification numbers, stock purchasing information, etc. is exchanged. Many TRS users are uneasy about sharing this information using TRS. TRS users would like greater assurance that the rules of confidentiality are observed.

3. Information and Outreach

Carrier efforts to ensure that callers are aware of TRS have not been effective. Most outreach has focused on the TTY user, rather than the hearing public, yet successful use by TTY users of TRS requires that hearing users understand how TRS functions and be willing to use it. Frequently hearing people who are unfamiliar with TRS hang up on deaf callers. Improvements in TRS will be of limited use until this problem is remedied. We recommend that the Commission require TRS providers to broaden their outreach. Wider outreach programs should be better targeted at potential hearing TRS

users and should include descriptive inserts in phone bills, demonstrations at conferences and trade shows, and print and television advertisement. TRS cannot fulfill its promise of providing telephone accessibility until hearing callers accept TRS calls as automatically as they accept regular voice calls.

4. Other Areas of Improvement

A. Speed of Answer and Call Blockage

Commission rules limit the amount of time the TRS has in which to answer a call. Eighty-five percent of TRS calls must be answered within 10 seconds. No more than 30 seconds can pass between receipt of the dialing information and the dialing of the number to be called. However, there are discrepancies from state to state in how this time period is calculated. Some states do not count abandoned calls in this 10 second time frame. Others answer quickly but then put the caller in a queue to wait for a CA. And some average the length of answer time to ensure that the average length is within 10 seconds. The Commission should standardize the answering protocol so that consumers can rely on quick access to TRS and so that TRS providers receive clear guidance in this matter.

B. Introduction of Caller

Often the introduction of a TRS call is unfamiliar and uncomfortable to a hearing user. When the hearing individual answers the phone, the TRS says something like, "This is the _____ Relay Center calling for John Doe. Have you ever used a relay service before?" Often hearing people don't know what a relay center is, and they feel awkward being asked a question as soon as they pick up the phone. Many deaf, hard of hearing, and hearing callers prefer an introduction that allows the caller to be introduced before the TRS is mentioned, for example, "This is Rhonda Roe, a deaf caller calling through the _____ Relay Center for John Doe." While some TRS do offer this

option, Commission rules should ensure that all TRS offer it and should require providers to inform TTY users that this choice is available.

C. Caller Identification Service

The popularity of caller identification service is increasing. Individuals who subscribe to this service use it to screen and keep track of calls. They purchase it for the purpose of answering only the calls from people they wish to speak to. However, TRS users do not have the same advantages in using this service as non-TRS users do. TRS users find that calls from relay centers appear on the caller identification screen as "unavailable" or "out of area." Relay users want to know the number of the caller and whether it is a TRS call. In households which have both deaf and hearing members but only one phone line, often the deaf family member does not answer the phone unless he or she knows it is a TTY or TRS call. If a deaf person answers the phone and it is a voice call, both the caller and the deaf family member are frustrated by their inability to communicate. Therefore, some households use the caller identification system as a way for the deaf family member to know which calls to answer. If the TRS center shows up as "unavailable" or "out of area," the whole purpose of the caller identification system is lost. Commission rules should require that TRS pass through the caller's name and number with a notation that it is a TRS call.

D. Automatic Call Forwarding to TRS

Often hearing callers are unaware that they are calling a deaf individual. For example, this can happen in the case of a potential employer calling about a job interview or a place of business calling about an order a deaf person has placed. Many deaf and hard of hearing consumers would like to have an option of having that call automatically forwarded to TRS, which could then transfer the call back to the TTY and relay the content of the call.

This would require deaf and hard of hearing individuals to have two lines. One line would be dedicated to voice/forwarded calls, the other to TTY calls. This arrangement would allow the deaf or hard of hearing consumer more freedom to take voice calls. The Commission should encourage TRS providers to offer this service.

E. Consumer Profile

CAN believes that greater use of consumer profiles by TRS will result in service that is closer to functionally equivalent to the telephone service that hearing people enjoy. Such profiles could include information on frequently dialed numbers, how the consumer wants to be introduced, voice carryover, preferred type of connection (ASCII, voice, Baudot), carrier preference, spelling correction, and whether the consumer wants background noise to be communicated. Use of the profile should be voluntary on the part of the consumer, and profile choices should be subject to the same confidentiality rules as other TRS communications. Each phone line should be able to accommodate multiple users. In one household one might find various preferences for TRS use. TRS users should be able to identify themselves to the CA and then have their profile instructions followed. The number of profiles should not be limited to one per line, and consumers should be able to choose from as many preference categories as they like. When the TRS contract moves from one vendor to another, the profile should go with the contract, and confidentiality rules should apply. Users should be able to change their profile or stop using it at their discretion.

F. Call Release Feature

TTY users often are required to use TRS to connect to an establishment such as a hotel, hospital, or a large office with a central switchboard, and then ask to be transferred to an individual using a TTY. When the TTY comes on,

the call disconnects. There is no other way of contacting the individual except through the front desk, and in most cases, the front desk does not have a TTY, or if it does, the staff does not know how to use it. A "call release" protocol exists that will allow callers in this situation to connect to a TTY without being disconnected. The Commission's rules should require TRS to offer this feature.

G. Voice Menu Calls

Many deaf and hard of hearing callers are continually frustrated by the difficulty they encounter when attempting to contact a place of business where that establishment answers with a voice menu system. The use of this system has become widespread over recent years. Once the caller is connected, this system requires the caller to listen for the topic they are calling about, then press a number on the phone keypad that corresponds to that topic. These voice menu options are transmitted at a speed of approximately 200 words per minute, while the CAs' typing speed is much lower. The CAs are not able to type the choices, the TTY caller is unable to choose an option, and is thus the caller is unable to proceed with the call. Wide use of this system has left TTY users unable to reach by phone many establishments they need to contact.

Title IV of the Americans with Disabilities Act (ADA) requires that all states establish 24 hour a day TRS. It is because of the availability of TRS that the ADA does not require businesses to be directly accessible through TTYs. It was thought that TRS would give deaf and hard of hearing callers functionally equivalent access to business establishments. While that may have been true in the past, today the use of voice menu systems prevents that access.

As part of its TRS and Section 255 rulemaking, the Commission should require equipment commonly used by TRS to be able to appropriately handle voice menu systems and other systems that are not compatible with present TRS technology. Further, under Section 255 rulemaking, the Commission should require voice menu systems to be TTY compatible.

H. 900 Prefix Calls

Commission rules should mandate that TRS complete calls with a 900 prefix. Completion of these calls is technically feasible, and there is a demand among deaf and hard of hearing consumers for these services.

Because TRS calls are longer than other calls and the 900 number service providers charge by the minute, calls to these numbers can be quite expensive. For this reason, there should be an adjustment on the TTY user's bill so that the TTY user does not end up paying more than a non-TRS user would for the same call. Alternatively, the TRS could call the 900 number, allow the TTY user to hang up, obtain the information provided by the 900 service provider, and call back the TTY user with the information. This option would be limited to services that do not require interaction between the caller and the service provider.

I. Compatibility with New Technology

TRS has made a profound impact on the lives of deaf and hard of hearing people. The difference between total inaccessibility of telephone service and the ability to call any number is dramatic. There is no doubt that TRS has provided a much needed service.

To continue to improve accessibility, TRS must be compatible with changing technology in the world at large and among TTY users. We have already mentioned in these comments services such as voice menu and caller identification that cannot be used by deaf and hard of hearing callers in a

manner that is functionally equivalent to that of hearing callers. We have explained above improvements that easily could be made without great difficulty. It is extremely important that the Commission update TRS rules so that TRS will be compatible with changing technology used by hearing consumers.

TRS also must be compatible with new technology used by TTY callers. As mentioned earlier, TTY users have a variety of options with which to communicate with TRS. Among these are "plain old TTY" service, TTY using ASCII or an enhanced code technology, and a computer using ASCII or Baudot. Users experience problems using some of these technologies with TRS. ASCII users often find that when they contact TRS using ASCII, the CA cannot read the message, and the call is disconnected. There is more ASCII usage now in relay centers than before. In most states two to three percent of the calls use ASCII, but in some states the rate is as high as 5%.

As with ASCII users, users with enhanced code technology find that often TRS equipment is not compatible with this technology. This leaves users to fall back on "plain old TTY" service even though their TTYs have this advanced capability.

Technology for both voice telephone users and for TTY users will continue to advance. In order to meet the requirement of functional equivalency, TRS must keep pace with these improvements. Commission rules should require TRS to continually improve their technology so that deaf and hard of hearing consumers are not left behind.

I. Transition Between Vendors

Generally, TRS contracts last between three and five years. When the contract moves from one vendor to the next, that transition should be invisible to the user. Often, however it is not. Frequently different vendors

have different protocols that users must learn, CAs without proper training are hired, and the second vendor may offer fewer services than the first. Commission rules should require TRS providers to work together to provide a seamless transition from one provider to the next.

K. Toll Calls

As previously stated, a TRS call is much slower than a voice to voice call. When tolls are involved, a call quickly can become very costly. Some providers and long distance carriers offer discounts to TRS users, but these are not uniform. Further, sometimes these discounts are provided when the call is initiated by a TTY user, but not when it is initiated by a voice caller. Commission rules should ensure that TRS toll calls are discounted so that they cost the same as equivalent voice calls.

L. 711

CAN applauds the Commission's decision to reserve 711 as the TRS number nationwide. This action will make TRS much more convenient for both hearing and deaf users. Designating 711 as a universal relay number will make it more visible to future users. There are very few N11 numbers available, and the fact that the Commission has reserved this for TRS shows the importance of a nationwide TRS system. We thank you for your recognition of this important service that benefits deaf, hard of hearing, and hearing telecommunications users.

III. Monitoring and Enforcement

CAN recommends better monitoring of TRS and better enforcement of TRS rules. Currently, when consumers have a TRS complaint, they must file it with the state certifying agency. In reality, most consumers are not even sure what to do when they have a complaint. Consumers who are aware of the process do not feel comfortable with it or do not trust a mechanism

whereby they file a complaint with the very same agency they are complaining about.

The certifying agency has 180 days to respond to a complaint. If the consumer is not satisfied, the consumer may then file a complaint with the Commission. In part because of this long response time, consumers are reluctant to file a complaint. Consumers report that when they do file complaints with the certifying agency, the complaint is not resolved to their satisfaction. At that point, the consumer is less motivated to file a complaint with the Commission. In fact, there have been very few TRS complaints filed with the Commission, while anecdotal evidence suggests that there have been many violations of TRS rules.

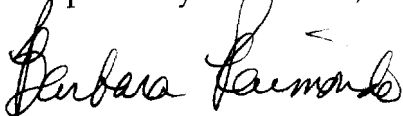
We recommend that the Commission implement a national advisory council through which TRS can be monitored, evaluated, and improved. This council should measure TRS effectiveness and encourage the use of new technologies, including the use of real time transmission. It should be made up of TRS providers and consumers, and should have authority to address consumer complaints in a timely and "user friendly" fashion. The council should engage in extensive outreach to ensure that TRS users are aware of its role. It should review TRS standards every two years.

IV. Conclusion

CAN thanks the Federal Communications Commission for issuing this NOI and for its commitment to telecommunications access for all Americans. We encourage the Commission to use the information gathered through this NOI as a basis for rules that will improve TRS. Deaf, hard of

hearing, and hearing Americans nationwide look forward to improved relay services.

Respectfully submitted,



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March 17, 1997

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